

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

REC'D APR 03 2020

SAFYA ROE YASSIN

MOVANT

CRM. NO. 16-03024-01-CR-MDH

MOTION FOR COMPASSIONATE RELEASE

EMERGENCY MOTION UNDER
3582 (c) (1) (A) (i) and (C) family circumstance and (D)

NOW COMES SAFYA ROE YASSIN, Petitioner, appearing Pro SE. YASSIN comes before this Court, humbly seeking a Compassionate Release due to extraordinary and compelling reasons.

Ms. Yassin suffers from a debilitating medical condition, making her more prone to illness and infections, especially in light of the recent outbreak and pandemic of Covid-19 Virus. Ms. Yassin suffers from Cauda Equina Syndrome, which is a life-long debilitating condition (spinal cord injury) causing her numerous deficits, including a Neurogenic Bladder, requiring her to self-catheterization of her bladder up to 5 times per day. This makes her very vulnerable to infections.

She also suffers from Neuropathy in her legs, which has left her with half her legs and feet numb, making it difficult for her to get around, sometimes requiring her to

use a cane at times, and needing an AFO foot brace to support her right foot. She also suffers from muscle atrophy due to her spinal cord injury, causing severe muscle weakness in her lower extremities.

Ms. Yassin also suffers from Renal Insufficiency and a condition of her kidneys known as Medullary Sponge Kidney, that causes enormous kidney stones, which she has had multiple surgeries for, and compounds her bladder problems. Ms. Yassin also suffers from a very rare Spinal Cord Cyst that is called Intradural Arachnoid Cyst. This has flattened Ms. Yassin's spinal cord, causing her some arm numbness, rib numbness and severe middle back pain that requires her to lay down for large portions of the day.

Ms. Yassin is on Medical Convalescence in Federal Prison, unable to work, as she was also declared permanently disabled by Workers Compensation as well as Social Security from a work related injury that required several emergency spinal surgeries - 2 Laminectomies.

All of these medical conditions coupled with the

extraordinary development of the Covid-19 Global Pandemic spreading throughout the world and nation, including the prison population, making Ms. Yassin extremely vulnerable. Ms. Yassin also has a 66 year old father caring for her Minor children, one child who is disabled and suffers from severe Autism himself.

Ms. Yassin has served well over 50% of her sentence, with a projected release date of October of 2023. Ms. Yassin has learned a great deal since her arrest in 2016. Ms. Yassin has been a model inmate throughout her incarceration with no disciplinary actions against her.

Ms. Yassin has taken numerous classes to help her transition back into society. She has a newfound interest in the Law, and has started a College course through Blackstone to become a Paralegal. Ms. Yassin has also taken numerous Re-Entry Program classes at Aliceville FCI to help her re-enter the community, not only for her own benefit, but ultimately to help others. Ms. Yassin would like to rejoin her community, and be able to give back in a meaningful way.

Ms. Yassin has been rated as Low Security

and low risk for Recidivism under the First Step Act, Ms. Yassin can assure this Court and Your Honor that she will never have any future interactions with Law Enforcement that would land her back in this Court or any other Courts.

Ms. Yassin has a strong family support system. Ms. Yassin also has a regular Physician, a Urologist, Neurologist and Nephrologist that she will see to take care of her medical conditions. Ms. Yassin has a home plan, she will be returning to her home in Buffalo, Missouri where her children are awaiting her return.

Ms. Yassin has not asked her Warden at FCI Aliceville for a Compassionate Release since she is not technically in BOP Custody at this time. Ms. Yassin is currently on a Writ for a 2255 Motion before this court. Ms. Yassin is currently being housed at the Greene County Justice Center, which is grossly over-crowded, making Ms. Yassin vulnerable to the spread of infections, especially the Covid-19 Virus and other diseases. This is especially so due to her frequent catheterizations.

Ms. Yassin is at a severe disadvantage for

obtaining her medical records due to the pandemic and her being housed at the Greene County Justice Center, which limits her correspondence only to post-cards. This also limits her for obtaining her records from Aliceville FCI. All of Ms. Yassin's medical conditions are on the Record, and documented in her PSI and Aliceville FCI records.

Due to all these extraordinary circumstances, Ms. Yassin is coming before Your Honor humbly seeking a Compassionate Release

Humbly Submitted,

SAFYA ROE YASSIN



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